

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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COACH SERVICES, INC.,	:	Civil Action No. 07-cv-08354 (RPP)
	:	
Plaintiff,	:	
	:	
v.	:	
	:	
VANI U.S.A. INC.,	:	
LA VANI INC., GUANGZHOU HUANI	:	
CO. LTD. and GUANGZHOU	:	
WEINI LEATHER CO. LTD.,	:	
	:	
Defendants.	:	
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**PLAINTIFF'S APPLICATION FOR ATTORNEYS FEES AGAINST DEFENDANTS  
WEINI AND HUANI PURSUANT TO RULE 37(b) F.R.CIV.P.  
INCORPORATING SUPPORTING MEMORANDUM**

Plaintiff, Coach Services, Inc. hereby moves this honorable Court for an Order pursuant to Rule 37(b) F.R.Civ.P. granting attorneys' fees for the failure of defendants, Guanzhou Weini Leather Co. Ltd. ("Weini") and Guangzhou Huani Co. Ltd. ("Huani") to comply with plaintiff's discovery requests.

As the Court knows, plaintiff served document requests on defendants on December 21, 2007. Defendants Weini and Huani did not respond to the requests. By letter motion, plaintiff asked the Court for an order compelling compliance with the requests. By an order dated April 17, 2008, the Court ordered defendants to comply with the requests by April 30, 2008. Defendants Weini and Huani still did not comply with the requests, and have not done so to date.

At a hearing on May 19, 2008, the Court noted that the defendants Weini and Huani apparently are not continuing to defend this action, and authorized plaintiff to submit an application for attorneys' fees for their failure to comply with the discovery order. This

application is supported by the accompanying declaration of Norman H. Zivin. By this application, plaintiff seeks attorneys' fees in the amount of \$3,376.50.

Plaintiff also is submitting a proposed Final Judgment against the defendants Weini and Huani. Any amount awarded as attorneys' fee should be incorporated in the Final Judgment.

It is respectfully submitted that the application for attorneys' fees should be granted and Final Judgment entered in favor of plaintiff and against defendants Weini and Huani. It should be noted that this is not a request for attorneys' fees or for a Final Judgment against defendants Vani USA Inc. and LA Vani, Inc.

Dated: June 6, 2008  
New York, NY

Respectfully,

COOPER & DUNHAM LLP

By: /s Norman H. Zivin/  
Norman H. Zivin (NZ-6053)  
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Attorneys for Plaintiff COACH SERVICES, INC.

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on June 6, 2008, the foregoing **PLAINTIFF'S APPLICATION FOR ATTORNEYS FEES AGAINST DEFENDANTS WEINI AND HUANI PURSUANT TO RULE 37(b) F.R.CIV.P. INCORPORATING SUPPORTING MEMORANDUM** was filed using the CM/ECF system. Notice of this filing will be sent to the following counsel of record for the interested parties by operation of the Court's electronic filing system:

Frances P. Hadfield, Esq.  
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Attorneys for Defendants

/s Norman H. Zivin/  
Norman H. Zivin